

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on Sunday  
and Holiday Collections

Docket No. C2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO CARLSON INTERROGATORIES DFC/USPS-60 - 69  
(July 30, 2001)

DFC/USPS-60 - 69 were filed on July 16, 2001. On July 26, 2001, the Postal Service filed partial objections to items 61, 63, 64, 65, and 69. As it indicated it would do in those objections, the Postal Service is filing responses to those items, but is not waiving its objections. Each interrogatory is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 30, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-60.** Please refer to the response to DFC/USPS-52 and USPS-LR-4. The library reference includes e-mail messages indicating, for example, that "Becky Dobbins needs a release showing that we publicized the Saturday Collection Schedule" for July 3, 2000. These e-mail messages are generally dated in July 2000.

- a. Please explain why Postal Service headquarters specifically requested copies of these press releases after July 3, 2000.
- b. Please explain whether the request described in these e-mail messages represents a standard practice after the eve of a holiday on which Postal Service headquarters has authorized deviations from the collection schedules that normally apply for day of the week that corresponds to the eve of the holiday.

**RESPONSE:**

a. The subsequent determination to request copies of press releases was apparently intended to underscore to the field the continuing importance of the link between collection adjustments and the submission of press releases.

b. No. The situation described (Headquarters authorization of advanced collections on a holiday eve) happens so rarely that there are no "standard practices" with respect to such situations. It is, however, standard practice in general for requests to adjust EXFC testing to be required to include documentation of intended public notification, and to be submitted in advance of the requested adjustment.

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**DFC/USPS-61.** Please refer to the response to DFC/USPS-51(b), which asserts that the P&DC in Portland, Oregon, did not cancel outgoing mail on Memorial Day in 1999.

- a. Please confirm that the postal holiday for Memorial Day in 1999 occurred on Monday, May 31, 1999.
- b. Please refer to Attachment 1 to DFC/USPS-61, which shows a photocopy of a stamped card that has a postmark from Portland, Oregon, dated May 31, 1999. Please reconcile the response to DFC/USPS-51(b) with Attachment 1 to DFC/USPS-61. If you cannot reconcile the response with this attachment, please confirm that the P&DC in Portland, Oregon, cancelled and processed outgoing mail on Memorial Day in 1999. (If necessary, upon request I will make the original stamped card available to the Postal Service for inspection.)

**RESPONSE:**

- a. Confirmed.
- b. Further investigations of the circumstances at the Portland OR P&DC on Memorial Day 1999 have revealed the following information. Management at the plant did not schedule cancellation operations for that day, and intended that cancellations would be deferred until the day following the holiday. Apparently on their own initiative, however, on-site personnel in the plant that day determined that available staff and available workload justified limited initiation of the cancelling operation. The activity conducted on the holiday was reported with the following day's activity in the MCRS data that constitutes the basis for the information provided in LR-2. Based on the new information from the Portland P&DC, the entry for that facility for Memorial Day 1999 should be 0.134, rather than the 0.000 that currently appears in LR-2.

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**DFC/USPS-62.** Please refer to the responses to DFC/USPS-14 and DFC/USPS-34.

- a. Does the "suspension of collections" on Christmas Eve in 1996 in Phoenix, Tucson, and Salt Lake City mean that some boxes in those areas were not collected at all on Christmas Eve in 1996? If not, please explain the meaning of "suspension of collections."
- b. Please confirm that the practice of performing early collections on Christmas Eve in 1992 and 1993, when Christmas Eve fell on a Thursday and Friday, respectively, was less frequent in 1992 and 1993 than it was in 1998 and 1999.

**RESPONSE:**

- a. Based on the material in LR-4, that appears to be the case.
- b. Anecdotal evidence suggests that the practice was less frequent in 1992 and 1993 than in 1998 and 1999.

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**DFC/USPS-63.** Please refer to the response to DFC/USPS-35(c). For districts other than New York, please explain why "there would be no practical efficiencies to be gained" by dropping early collections from collection boxes but retaining at least the final collection posted on each collection box.

**RESPONSE:**

The explanation is the same. Staffing of collection and processing operations on Saturday is set to handle less volume, and the last collection on Saturday is scheduled to maximize the efficient utilization of the lower level of available staff.

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**DFC/USPS-64.** Please refer to the response to DFC/USPS-42.

- a. Suppose that an EXFC test bundle is deposited in a collection box. Suppose, further, that none of the pieces in that bundle meets its service standard. Suppose, further, that each piece *is* postmarked on the day on which one would have expected each piece to be postmarked based on the date and time of deposit and the posted collection times on the collection box. Is this test bundle considered a zero bundle? If not, please explain why not.
- b. Suppose that an EXFC test bundle is deposited in a collection box. Suppose, further, that each piece is postmarked one day or more later than the date on which one would have expected each piece to be postmarked based on the date and time of deposit and the posted collection times on the collection box. Suppose, further, that at least one piece is delivered such that the piece meets the applicable First-Class Mail delivery standard. Is this test bundle considered a zero bundle? If yes, please explain.

**RESPONSE:**

a. Yes.

b. It depends. Recall that the term "zero bundle" evolved to assist personnel to discuss the types of situations encountered as EXFC reporting was becoming established. Consequently, it was a term that came into common usage without a precise definition, and can still be used by different people differently. Some might use the term to refer to a bundle in which absolutely none of the pieces met the standard. In that case, the answer to the question is no, those people would not consider the scenario described to constitute a "zero bundle" situation.

More recently, however, the term "zero bundle" has come to be used to refer to a bundle in which no overnight pieces met the overnight standard. Under that usage, if the hypothesized one piece that met its standard was overnight, it would not be a zero

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bundle. (That seems unlikely under the hypothetical, however, as it would appear that the only way that could happen under the assumed facts would be if an overnight piece were delivered on the same day it was postmarked.) If, however, the hypothesized one piece were not an overnight piece, and all of the overnight pieces failed to meet the overnight standard, then the scenario described could still be identified as a "zero bundle" situation under this more narrow definition of a "zero bundle."

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**DFC/USPS-65.** Please refer to the response to DFC/USPS-42(b). Please explain how and why zero bundles "are indicative of poor service quality."

**RESPONSE:**

By definition, a zero bundle occurs in instances in which none of a set of test mailpieces deposited together achieves the relevant established service standard. It is virtually tautological to suggest that an instance in which none of the mailpieces in question meet relevant established service standards indicates poor service quality.



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**DFC/USPS-66.** Please refer to the response to DFC/USPS-42(d). All else equal (including volume), please confirm that a zero bundle caused by a missed collection prior to a holiday may have an effect on service quality that is worse than the effect on service quality of a zero bundle caused by a missed collection on a day that does not directly precede a holiday because the mail may not be collected for one or more days beyond the originally scheduled collection date due to the holiday (and possibly an intervening Sunday).

**RESPONSE:**

Not necessarily. Consider a Veterans Day holiday that falls on a Wednesday, and a mailer who is depositing a letter for delivery within a one-day service area. If the mailer deposits the letter on Tuesday, the day directly preceding the holiday, the mailer may hope that the letter will be delivered on Thursday, the next delivery day. If the collection is missed on Tuesday, the letter will likely be collected on Thursday and (hopefully) delivered on Friday, one day later than expected. Now consider the same mailer who deposits his letter on the next Tuesday, not a day preceding a holiday, hoping for Wednesday delivery. A missed collection on that Tuesday would cause the letter to be collected on Wednesday and (hopefully) delivered on Thursday. Once again, the likely effect of the missed collection is delivery one day beyond the date expected based on the service standard. From the perspective of the mailer, the missed collection has had the same effect on service quality in both instances -- delivery one day later than the mailer's expectation.

On the other hand, consider the same set of scenarios, except with a letter for delivery within the two-day service area. For a letter deposited on either Tuesday, the expectation in both instances would still be for a Thursday delivery. If a missed

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collection on the Tuesday before the holiday causes the mail not to be collected until Thursday, then delivery is likely on Saturday, two delivery days behind expectations. Alternatively, if the mail deposit and the missed collection were on the following Tuesday, the letter would nonetheless be collected on Wednesday and likely delivered on Friday, and the effect of the missed collection would have been a delay of only one delivery day. Thus, a missed collection on the day immediately before a holiday may or may not have a different effect on service quality than a missed collection on a day not directly before a holiday.

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**DFC/USPS-67.** Please refer to the response to DFC/USPS-45. Please confirm that collection boxes located in front of some postal facilities, including stations that do not also function as carrier delivery units, are assigned to a street collection route that operates out of another facility; therefore, those collection boxes are not collected by "a returning carrier." If you do not confirm, please explain.

**RESPONSE:**

Confirmed for city delivery areas. In other areas, the box in front of a postal facility may be collected by a Highway Contract Route carrier, or by a rural carrier subsequently returning to another postal facility.

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**DFC/USPS-68.** Please refer to the response to DFC/USPS-46, which states that communications to the public in the Pacific Area "probably do not provide much information specifically about collection plans[.]" Please refer, also, to page 9 of the "Response of the United States Postal Service to Order No. 1307, and Motion for Reconsideration" (filed April 10, 2001), which states, "The matter of potential deception of the public regarding the services to be provided on specific holidays, while perhaps theoretically of interest, is not likely to be a substantial issue. Most mailers probably rely on three sources of information. One source is newspapers and other local media, which might include information on postal services within a broader summary of holiday shutdowns and the like. \* \* \*" Please confirm that media releases in the Pacific Area typically do not provide information describing collection plans for holidays on which the Postal Service plans to collect and process outgoing mail. If you do not confirm, please provide copies of the media releases that announce the collection plans.

**RESPONSE:**

The essence of this question appears to be to quote a portion of the response to DFC/USPS-46, and to request a confirmation of its veracity. The purpose of the appearance within the question of the reference to an earlier Postal Service pleading is unclear. It is confirmed that media releases in the Pacific Area typically do not provide information describing collection plans for holidays on which the Postal Service plans to collect and process outgoing mail. There is some recollection that there might have been instances in the past in which collection information was included, but no copies of such materials have been located.

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**DFC/USPS-69.** Please refer to the response to DFC/USPS-48. For each year from 1980 to 2001 for which data are available, please provide national EXFC and ODIS data that show the average number of days to delivery for First-Class Mail.

**RESPONSE:**

From ODIS, quarterly data from 1980 to present are attached. Since the EXFC program began more recently, data do not go back as far. EXFC On-Time Service Performance data go back the farthest, and are also attached. Lastly, the only available EXFC data regarding average days to delivery are also attached.

**ORIGIN-DESTINATION INFORMATION SYSTEM**  
**First-Class mail average days to delivery by Postal Quarter**

QTR	FY	DAYS	QTR	FY	DAYS
			4	1990	1.83
3	2001	1.97	3	1990	1.80
2	2001	2.05	2	1990	1.93
1	2001	1.91	1	1990	1.85
4	2000	1.86	4	1989	1.63
3	2000	1.90	3	1989	1.61
2	2000	1.96	2	1989	1.75
1	2000	1.85	1	1989	1.81
4	1999	1.81	4	1988	1.71
3	1999	1.84	3	1988	1.70
2	1999	1.92	2	1988	1.87
1	1999	1.80	1	1988	1.72
4	1998	1.80	4	1987	1.68
3	1998	1.85	3	1987	1.68
2	1998	1.95	2	1987	1.77
1	1998	1.88	1	1987	1.66
4	1997	1.86	4	1986	1.68
3	1997	1.87	3	1986	1.67
2	1997	1.98	2	1986	1.78
1	1997	1.87	1	1986	1.72
4	1996	1.80	4	1985	1.73
3	1996	1.80	3	1985	1.74
2	1996	1.94	2	1985	1.84
1	1996	1.79	1	1985	1.77
4	1995	1.77	4	1984	1.59
3	1995	1.78	3	1984	1.61
2	1995	1.86	2	1984	1.69
1	1995	1.79	1	1984	1.64
4	1994	1.81	4	1983	1.61
3	1994	1.84	3	1983	1.62
2	1994	1.97	2	1983	1.63
1	1994	1.76	1	1983	1.60
4	1993	1.73	4	1982	1.59
3	1993	1.73	3	1982	1.60
2	1993	1.78	2	1982	1.67
1	1993	1.69	1	1982	1.65
4	1992	1.74	4	1981	1.60
3	1992	1.74	3	1981	1.63
2	1992	1.78	2	1981	1.75
1	1992	1.70	1	1981	1.73
4	1991	1.69	4	1980	1.63
3	1991	1.81	3	1980	1.64
2	1991	1.98	2	1980	1.66
1	1991	1.83	1	1980	1.67

Source: ODIS Quarterly Statistics Reports  
Produced by Revenue, Volume & Performance Measurement

**External First-Class (EXFC) Measurement System**  
National Destinating On-Time Service Performance  
by Service Commitment

<b>EXFC - Overnight Commitment</b>				
National Destinating On-Time Service Performance				
<u>Year</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
1992	83.25	82.68	83.60	82.16
1993	83.59	83.01	84.30	83.59
1994	83.53	78.80	82.75	82.56
1995	84.09	84.52	86.82	87.23
1996	87.76	87.31	90.41	91.21
1997	90.77	90.75	92.15	92.35
1998	92.86	92.66	93.51	93.02
1999	92.78	93.15	93.54	93.74
2000	93.43	93.53	94.44	93.89
2001	93.02	92.80	94.06	

<b>EXFC - Two-Day Commitment</b>				
National Destinating On-Time Service Performance				
<u>Year</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
1992	77.11	74.36	76.17	74.91
1993	77.76	74.73	78.27	78.10
1994	76.52	66.72	72.37	74.36
1995	75.53	75.04	79.07	80.10
1996	79.49	75.54	80.04	80.25
1997	75.90	71.74	78.59	78.58
1998	78.88	78.70	86.06	87.66
1999	86.47	83.36	86.89	88.37
2000	86.41	83.60	87.02	87.87
2001	85.70	81.15	84.77	

<b>EXFC - Three-Day Commitment</b>				
National Destinating On-Time Service Performance				
<u>Year</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
1992	80.54	76.25	80.72	79.41
1993	81.92	77.16	80.18	81.62
1994	79.24	65.44	76.84	78.55
1995	80.16	75.52	82.19	82.72
1996	82.24	70.93	82.44	82.82
1997	79.01	70.03	80.20	80.14
1998	80.49	74.24	83.68	86.44
1999	86.69	79.18	86.87	88.12
2000	85.59	78.87	85.60	86.38
2001	83.77	73.76	81.00	

**External First-Class (EXFC) Measurement System**  
National Destinating Average Days to Deliver  
by Service Commitment

<b>EXFC - Overnight Commitment</b>				
National Destinating Average Days to Deliver				
<u>Year</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
1995	1.25	1.24	1.19	1.19
1996	1.18	1.18	1.12	1.10
1997	1.11	1.11	1.09	1.13
1998	1.12	1.13	1.11	1.12
1999	1.13	1.12	1.10	1.10
2000	1.11	1.11	1.09	1.11
2001	1.13	1.13	1.11	

<b>EXFC - Two-Day Commitment</b>				
National Destinating Average Days to Deliver				
<u>Year</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
1995	2.24	2.30	2.18	2.16
1996	2.17	2.26	2.15	2.13
1997	2.20	2.30	2.16	2.18
1998	2.16	2.17	2.05	2.02
1999	2.01	2.08	2.01	1.98
2000	2.00	2.08	2.01	2.00
2001	2.04	2.15	2.08	

<b>EXFC - Three-Day Commitment</b>				
National Destinating Average Days to Deliver				
<u>Year</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
1995	2.93	3.05	2.91	2.84
1996	2.88	3.24	2.92	2.86
1997	2.99	3.24	3.01	3.01
1998	3.01	3.13	2.94	2.80
1999	2.81	3.05	2.86	2.79
2000	2.86	3.04	2.91	2.85
2001	2.92	3.20	3.05	



**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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